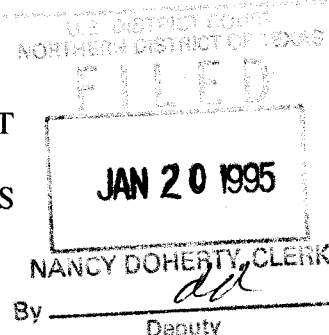


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

vs.

TIMOTHY NEWMAN BROWN

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CASE NO.: 5:95-MG-005

MOTION FOR PRETRIAL DETENTION

The United States moves for pretrial detention of the defendant pursuant to 18 U.S.C. Section 3142(e) and (f).

1. Eligibility of Case: This case is eligible for a detention order because the case involves:

- ☒ X Crime of violence [Title 18 U.S.C. 3156]
- ☒ X Maximum sentence of LIFE imprisonment or death
- ☒ X Controlled Substance offense punishable by 10 or more years
- ☐ Felony with 2 prior convictions in above categories
- ☒ X Serious risk that the Defendant will flee
- ☐ Serious risk that Defendant will obstruct justice

2. Reason for Detention. The Court should detain the Defendant because there are no conditions of release which would reasonably assure:

- ☒ X Defendant's appearance as required
- ☒ X The safety of the community
- ☐ The safety of another person.

GOVERNMENT'S MOTION
FOR PRETRIAL DETENTION - Page 1

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3. The United States will invoke a rebuttable presumption against the Defendant because:

X there is probable cause to believe that the Defendant has committed a Controlled Substance
Offense punishable by 10 or more years imprisonment

X there is probable cause to believe that the Defendant has committed a firearms offense under
Title 18, United States Code, Section 924(c)

4. Time for Detention Hearing. The United States requests the Court to conduct the
detention hearing

___ at the Defendant's first appearance

X After a continuance of 10 days pursuant to Title 18, United States Code,
Section 3142(d)(1)(A)(i).

Respectfully submitted,


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UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above pleading was this day served upon the
Defendant or his counsel of record in accordance with the provisions of Rule 49 of the Federal
Rules of Criminal Procedure.

DATE: 1-20-95



JOHN P. BRADFORD
Assistant United States Attorney